Exh. F

1   conviction and verify that that's an accurate

2   relationship.

3   Q.   Okay. Well, but their job is a lot easier

4   if you find a conviction for a felon within the NICS

5   database, correct?

6   MR. STERN: Objection.

7   THE WITNESS: It depends on the prohibitor.

8   BY MR. JACOB:

9   Q.   Well, I'm talking about a felony conviction,

10 a crime punishable by more than a year in prison?

11   A.   Yes.

12   Q.   That's instant denial, right?

13   A.   If the record's provided.

14   Q.   Sure.

15   A.   If it's available.

16   Q.   And obviously in order for that system to

17 work, you have to have the record of the felony

18 conviction, right?

19   MR. STERN: Objection.

20   THE WITNESS: I mean, in most instances that

21 would make it work. But we have to do a lot of

22 research on our records.

1   BY MR. JACOB:

2   Q.   You have to do a lot of research if you have

3   a record of an individual who has a conviction for

4   greater than one year in prison?

5   A.   A lot of times we don't have the conviction

6   information.

7   Q.   Sure.   Set that aside for a second.   I'm not

8   talking about when you don't have it.

9   I'm talking about, you have in front of you

10   an individual whose biographic data matches the

11   request and you see has a conviction for a felony,

12   crime punishable by greater than a year in prison.

13   That's an instant deny, isn't it?

14   A.   It is.

15   Q.   Let me flip to Page 12 of Exhibit 2.   Do you

16   see that?

17   A.   Yes, I do.

18   Q.   Can you tell me what we're looking at on

19   Page 12 of Exhibit 2?

20   A.   This is a sample of how a transaction would

21   either receive a proceed, a delay or a deny through

22   our system.   Excuse me.

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1 system searches these three databases in Exhibit 2,

2 Page 7, right?

3   MR. STERN: Objection.

4   THE WITNESS: The NICS system searches the

5 three databases.

6 BY MR. JACOB:

7   Q.   Yes.

8   So what is the Interstate Identified Index?

9   A.   It's a database that houses all of the

10 criminal history records associated with an arrest

11 charge with a ten print, fingerprint card.

12   Q.   What is the National Crime Information

13 Center?

14   A.   It's a database that houses wanted persons

15 protection orders and other property files.

16   Q.   Does the National Information Center contain

17 a database of NICS denies -- take that question back.

18 Let me ask that again.

19   Does the National Crime Information Center

20 contain a database of individuals who the NICS has

21 previously denied a firearm to?

22   A.   It has a denied persons file within it.

1   Q.   And what is the NICS indices?

2   A.   The NICS indices is a database that houses

3 prohibitors that could not reside in the triple I or

4 the NCIC, and they are an automatic denial when hit

5 upon.

6   Q.   Okay. And this is going to help me sort of

7 understand where everything lays in the bigger scheme

8 of things.

9   So if we could kind of build an

10 organizational chart for a second.

11   So you have the NICS Background Search

12 System that searches these three databases; the III,

13 the NCIC and the NICS indices, correct?

14   A.   It automatically searches all three

15 databases, correct.

16   Q.   Sure. And what about this Department of

17 Homeland Security? There's a non-solid line to that

18 one?

19   A.   If there's a non-U.S. citizen, then we would

20 access that database to look at their holdings.

21   Q.   Okay. So for U.S. citizens, we're not

22 worried about the Department of Homeland Security,